

### Sampling Design

1. Was sampling authorized and permitted by DSL (access agreement) and the USACE (joint removal fill permit)?
2. Why were samples collected from the upper 10-cm instead of 30-cm as done by the LWG? How can this provide a meaningful comparison?
3. Why wasn't sampling focused in PTW areas where imperial information on natural recovery is more relevant?
4. Why wasn't ISM employed in order to minimize variability with heterogeneity observed in previous studies?
5. Was there consideration given to collecting collocated surface/subsurface samples so that these ratios could be compared to previous data – a key line of evidence for natural recovery is the lower concentration of surface to subsurface contamination?

### Interpretation

1. The 8-8-15 letter to Grandinetti and Woolford provides a means to means comparison of 2002 data to 2014 data. How can this be a meaningful comparison since the 2002 sampling (and other RI sampling efforts) targeted source areas while the 2014 samples were reportedly selected on randomized grid to account for the range of PCB concentrations reported in previous studies? Given this “apples to oranges” sampling design why not evaluate other comparisons such as 2014 SWACs to 2002 SWACs and 2014 data to corresponding 2002 polygons (e.g., median, mean, UCL)?
2. In selecting a background data set, how can it be appropriate to use bedded sediment data from the Downtown Reach which is a State cleanup site with numerous areas recently and currently undergoing active remediation?